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June 7, 2018

**VIA CM/ECF**

Honorable Edgardo Ramos  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 619  
New York, NY 10007

**Re: *Ithaca Capital Investments I S.A. et al v. Trump Panama  
Hotel Management LLC et al, Civil Action No. 18-cv-00390***

Dear Judge Ramos:

This firm is counsel to defendants Trump Panama Hotel Management LLC and Trump International Hotels Management LLC (“Defendants”). Pursuant to Rule 1.E of the Court’s Individual Practices, we write to request an adjournment of the pre-motion conference to June 22, 2018 at 2:00 p.m., a date and time which the Courtroom Deputy Clerk, Ms. Rivera, indicated was available. The pre-motion conference is presently scheduled for June 11, 2018 at 10:00 a.m.

This is the first request for such an adjournment. As explained to the Courtroom Deputy Clerk, Ms. Rivera, the reason for the request is that counsel for Defendants is unavailable on June 11. Counsel for Plaintiffs have consented to this adjournment.

If the foregoing request and timing are acceptable to Your Honor, we would respectfully request that Your Honor “So Order” this letter. We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Todd E. Soloway

Todd E. Soloway

cc: All Counsel (via CM/ECF)